

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

HONEYWELL INTERNATIONAL INC.,)
et al.)
Plaintiffs,)
)
)
v.) C.A. No. 04-1337-KAJ
)
AUDIOVOX COMMUNICATIONS CORP.,)
et al.)
Defendants.)
)

HONEYWELL INTERNATIONAL INC.,)
et al.)
Plaintiffs,)
)
v.) C.A. No. 04-1338-KAJ
)
APPLE COMPUTER, INC., et al.)
)
Defendants.)

DECLARATION OF PRIYA BALASUBRAMANIAM

1. I am Senior Manager of Flat Panel Display Procurement at Apple Computer, Inc., ("Apple"), and I submit this Declaration on behalf of Apple in support of the pure customer defendants' motion to stay the above-entitled actions.

2. I have been continuously employed by Apple since July 2001 and have held a variety of positions. From July 2001 until April 2003 I was a Global Supply Manager for microprocessor procurement. From April 2003 to September 2004 I was a Global Supply Manager for flat panel display procurement. I have held my current

position since September of 2004. By virtue of these positions and in my current role as Senior Manager of Flat Panel Display Procurement, I am familiar with Apple's manufacturing activities, including, but not limited to, those relating to Apple products that incorporate liquid crystal displays ("LCDs").

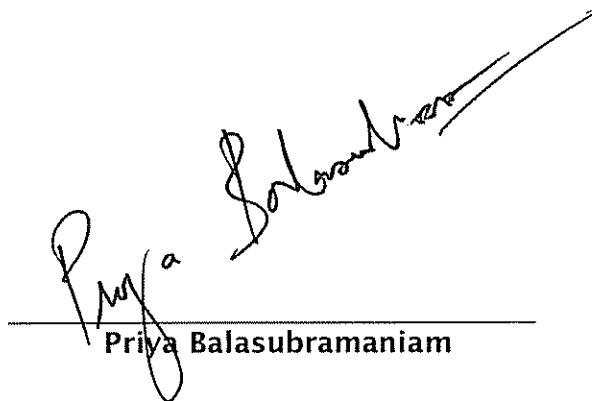
3. Apple is in the business of, among other things, the design, manufacture and sale of notebook computers, some of which include LCDs.

4. The only Apple products accused of patent infringement by Honeywell in this case are notebook computers incorporating LCDs.

5. Apple does not design, manufacture or assemble any of the LCD screens which are incorporated in its notebook computer products. Rather, Apple purchases all of the LCD screens from outside suppliers and manufacturers.

6. Pursuant to Section 1746 of Title 28 of the United States Code, I declare the foregoing to be true and correct under the penalties of perjury of the United States of America.

Dated: Cupertino, CA
May 5, 2005



Priya Balasubramaniam

CERTIFICATE OF SERVICE

I hereby certify that on May 6, 2005, I hand delivered the foregoing document to the following persons and electronically filed the foregoing document with the Clerk of the Court using CM/ECF which will send notification of such filing to the following:

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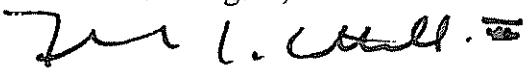
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